ILEC/ State	Has State Ordered Metrics and Standards	Docket/ Order Number	How Metrics and Standards Were Adopted	Whether Metrics and Standards Are Regional or State Specific	Does State Hold Periodic Reviews of the Metrics and Standards	Whether Metrics and Standards Have an Associated Remedy Plan	Whether a 3 rd Party Tested or Audited the Metrics	What General Improvements To the Plans Are Needed
Conn.	No. There is no state plan in place yet. SBC/SNET is subject to the SBC/AIT FCC merger measures and penalties. Also, WCOM has negotiated /arbitrated a performance assurance plan with SNET.	State proceeding is Docket No. 99-07-27 provides for an industry working group to negotiate and recommend to the DPUC specific performance standard measures and submeasures, penalties, business rules and terms and conditions of implementing performance measures for the wholesale provision of telecom services by the incumbent.	Metrics will be proposed by an industry-working group and ultimately approved by the DPUC.	The merger measures SNET is required to report results against use the Texas business rules, standards, etc.	TBD	TBD	TBD	There are no state specific metrics, standards or remedies. Remedies under the SBC/AIT merger conditions are not paid to affected CLECs.

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ILEC/ State	Has State Ordered Metrics and Standards	Docket/ Order Number	How Metrics and Standards Were Adopted	Whether Metrics and Standards Are Regional or State Specific	Does State Hold Periodic Reviews of the Metrics and Standards	Whether Metrics and Standards Have an Associated Remedy Plan	Whether a 3 rd Party Tested or Audited the Metrics	What General Improvements To the Plans Are Needed
Illinois	Yes. PMs in place	Merger	Proceedings resulted	About 100 regional	Six-month reviews	No. Although	Yes. Currently	Metrics and
	per state condition for	condition # 30	from merger conditions and state	collaborative- developed PMs, with	of regional PMs	Texas plan is available for	problems with	standards limited

Illinois	Yes. PMs in place per state condition for approval of SBC-AIT merger. Recently passed state law requires wholesale metrics, establishes benchmarks for various wholesale products: loops, UNE-P, etc. State proceeding resulting from law is in progress.	Merger condition # 30 of SBC/AIT Merger Order: Docket No. 01-0120 State-law derived proceeding: Docket No. 01- 0539	Proceedings resulted from merger conditions and state legislation.	About 100 regional collaborative-developed PMs, with less than 15 state specific PMs. Most regional PMs have the same benchmarks; a few have a different standard for one or more states. Less than 5 regional PMs have differing state standards Some regional PMs are ranked differently for remedies, e.g., Tier 1/Tier 2. State specific plan derived from state law pending.	Six-month reviews of regional PMs held with AIT, CLECs and state staffs. Little work has been done so far on remedies in reviews. Meetings move from state-to-state, with disputed issues and consensus agreements brought back to each state for decision and approval.	No. Although Texas plan is available for contract inclusion on interim basis until state finishes final remedy plan litigation.	Yes. Currently problems with metric replication are delaying the 3 rd party test.	Metrics and standards limited to those included in SBC/AIT merger conditions. Remedy plan is weak. Problems with metric replication identified.
Indiana	Yes, reports on the Texas metrics. A state specific proceeding has begun, but talks ended prior to completion of work. Next steps remain pending.	Cause No. 41657	Generic proceeding pending.	About 100 regional collaborative-developed PMs, of which less than 15 are state specific. Regional PMs generally have the same benchmarks; a few have a different standard for one or more states. Less than 5 regional PMs have differing state standard. Some regional PMs are ranked differently for remedies, e.g., Tier 1/Tier 2.	Six-month regional reviews of PMs held with AIT, CLECs and state staffs. Little work has been done on remedies so far in reviews. Meetings move from state-to-state, with disputed issues and consensus issues brought back to each state for decision and approval.	No. Some remedies paid only under individual ATI-CLEC Interconnection Agreements.	TBD	State specific metrics and standards have not been ordered, instead relying on Texas metrics.

ILEC/	Has State	Docket/	How Metrics and	Whether Metrics	Does State Hold	Whether	Whether a 3 rd	What General
State	Ordered	Order	Standards Were	and Standards	Periodic Reviews	Metrics and	Party Tested or	improvements
	Metrics and	Number	Adopted	Are Regional or	of the Metrics	Standards	Audited the	To the Plans
}	Standards			State Specific	and Standards	Have an	Metrics	Are Needed
						Associated		
						Remedy Plan		

Kansas	Yes.	Docket No. 97- SWBT-411-GIT	271 proceeding	Modeled after Texas 271 plan measures and standards.	Yes, reviews conducted every 6 months. TX PUC will conduct the review and KS is free to participate.	Yes. Based on TX remedy plan. While % of net revenue is the same as TX, dollar amounts are specific to KS.	No	Remedy plan weak since based on flawed TX K table. OSS not subject to 3 rd party test.
Michigan	Yes. PMs have been ordered. They were largely agreed to by the parties.	Docket No. Case No. U-11830.	Generic proceeding. AIT region-wide collaborative	About 100 PMs, less than 15 are state specific. The regional PMs generally have the same benchmarks; a few have a different standard for one or more states. Less than 5 regional PMs have differing state standards. Some regional PMs are ranked differently for remedies, e.g., Tier 1/Tier 2. With some state specific variations, in some cases resolved via state dispute resolution process.	Six-month regional reviews of PMs held with AIT, CLECs and state staffs. Little work has been done on remedies so far in reviews. Meetings move from state-to-state, with disputed issues and consensus issues brought back to each state for decision and approval.	Yes.	Yes. The metrics are being used as part of a 3 rd party OSS Test.	Some improvement required, although Michigan metrics, standards and remedy plan are superior to those in other AIT states.
Missouri	Yes.	Case No. TO-99-227	271 proceeding	Modeled after Texas 271 plan measures and standards.	Yes, reviews conducted every 6 months. TX PUC will conduct the review, and MO is free to participate.	Yes. Based on TX remedy plan. While % of net revenues is the same as TX, amounts are specific to MO.	Yes. PSC audited the measurement reporting system and results.	Remedy plan weak since based on flawed TX K table. OSS not subject to 3 rd party test.

State	Has State Ordered Metrics and Standards	Order Number	How Metrics and Standards Were Adopted	Whether Metrics and Standards Are Regional or State Specific	Does State Hold Periodic Reviews of the Metrics and Standards	Whether Metrics and Standards Have an Associated Remedy Plan	Whether a 3 rd Party Tested or Audited the Metrics	What General Improvements To the Plans Are Needed
Nevada	Yes. Nevada Bell has had measures and standards since June 1999. The measures and standards were revised effective May 2001 to incorporate parties' negotiated changes to the measures.	Docket No. 97-9022	The measures and standards were agreed to after several months of collaborative workshops. They were "stipulated" to by Nevada Bell, Verizon, Sprint and the participating CLECs, and ordered by the Commission.	The measurements were developed specifically for California and Nevada.	Periodic reviews were agreed to by the parties. It is prescribed by a Commission rulemaking that they occur annually.	Yes, effective as of August 2001, per a PUC decision in Docket No. 01-1048.	Yes, the measures were audited by PWC. Nevada Bell did not have its own 3 rd party OSS Test. It has requested that the PUC rely on the test that was conducted for Pacific Bell.	Ok, although the real test of the measures and standards will occur once commercial volumes exist. No Tier II incentive provision. It is possible that the parties have overlooked a process that

turns out to be critical to the OSS process, or that the ILEC's interpretation of the business rules allows it to under-report performance failure.

STATE METRICS MATRIX PREPARED BY WORLDCOM How Metrics and Whether Matrice Does State Hold Whether Whether a 3rd

ILEC/ State	Has State Ordered Metrics and Standards	Docket/ Order Number	How Metrics and Standards Were Adopted	Whether Metrics and Standards Are Regional or State Specific	Does State Hold Periodic Reviews of the Metrics and Standards	Whether Metrics and Standards Have an Associated Remedy Plan	Whether a 3 rd Party Tested or Audited the Metrics	What General Improvements To the Plans Are Needed
Ohio	Yes. TX metrics were ordered as a condition of the SBC-AIT merger. Metrics have been modified in the regional 6-month collaboratives	Case no. 98- 1082-tp-amt. In 2000, Ameritech filed a motion to establish a procedural schedule for its anticipated 271 filing. In June 2000, the PUC established Case No. 00-942-tp-coi to address OSS and PM issues, 3'd party testing and its 271 application.	Initially addressed by stipulation in SBC/AIT merger docket. The stipulation established industry collaboratives to evaluate the feasibility and applicability of implementing the Texas measures. Collaborative participants were given opportunity to propose changes to the metrics and to bring disputed issues to the commission for resolution. Some measures were added and modifications were made to the existing TX measures via a series of joint pleadings filed in October 2000. The OSS collaborative proceeded on the same track. In December 2000, the PUC acknowledged the filing of the agreed-to measures and OSS issues, approved the master test plan for the OSS test conducted by KPMG. Briefs filed in February 2001 regarding disputed measurement and OSS issues.	The measures are basically regional, although there may be state-specific differences because of the collaboratives established in each Ameritech state. The measures are based on the Texas plan and include 105 of the TX PMs.	Six-month regional reviews of PMs held with AIT, CLECs and state staffs. Little work has been done on remedies so far in reviews. Meetings move from state-to-state, with disputed issues and consensus issues brought back to each state for decision and approval. Amended measures were filed in June 2001 and October 2001.	No. It is a disputed issue that has been deferred for later consideration. Penalties will be tied to the measures based on the Texas remedies plan. These are pending commission resolution.	The 3 rd party test is underway and the measures will be tested. The stipulation established a collaborative to address OSS issues, and as part of the order approving the stipulation, the commission ordered a 3 rd party OSS test.	No remedies yet. Texas remedy plan is not sufficient and the Commission has indefinitely deferred the development of an appropriate remedy plan.

ILEC/ State	Has State Ordered Metrics and Standards	Docket/ Order Number	How Metrics and Standards Were Adopted	Whether Metrics and Standards Are Regional or State Specific	Does State Hold Periodic Reviews of the Metrics and Standards	Whether Metrics and Standards Have an Associated Remedy Plan	Whether a 3 rd Party Tested or Audited the Metrics	What General Improvements To the Plans Are Needed
Oklahoma	Yes.	Cause No. PUD 97-0000560	271 proceeding	Modeled after Texas 271 plan measures and standards.	Yes, reviews conducted every 6 months. TX PUC will conduct the review, and OK is free to participate.	Yes. Based on TX remedy plan. While % of net revenues is the same as TX, dollar amounts are specific to OK.	No	Remedy plan weak since based on flawed TX K table. OSS not subject to 3 rd party test.
Texas	Yes	16251, Order No. 55	271 proceeding	Anchor state, other SWBT states, as well as Ameritech states mirror the Texas plan measures.	Periodic reviews are held every 6 months.	Yes.	A review of the measures was performed by Cap Gemini as part of the 3 rd party OSS test. The measures were also used to evaluate the test output.	Remedy plan is weak because plan includes " K table" mitigation
Wisconsin	Yes. State proceeding on metrics concluded in 2000.	Docket No. 6720-TI-160 (the OSS docket)	State proceeding	There are about 100 PMs, less than 15 of which are state specific. The regional PMs generally have the same benchmarks; a few have a different standard for one or more states. Less than 5 regional PMs have differing state standards. Some regional PMs are ranked differently for remedies, e.g., Tier 1/Tier 2.	Six-month regional reviews of PMs held with AIT, CLECs and state staffs. Little work has been done on remedies so far in reviews. Meetings move from state-to-state, with disputed issues and consensus issues brought back to each state for decision and approval.	PSC issued a Remedy Plan Order Sept. 25, 2001. AIT filed motion for and obtained Stay of portions of the Order requiring AIT to make payments under remedy plan. Court schedule pending for briefing and ruling. Decision not expected before May 2002.	TBD	AIT is still not required to pay remedies yet.

ILE	C/ Has Stat	e Docket/	How Metrics and	Whether Metrics	Does State Hold	Whether	Whether a 3rd	What General
State	e Ordered	Order	Standards Were	and Standards	Periodic Reviews	Metrics and	Party Tested or	Improvements
	Metrics :	and Number	Adopted	Are Regional or	of the Metrics	Standards	Audited the	To the Plans
	Standard	ls	1	State Specific	and Standards	Have an	Metrics	Are Needed
				_		Associated		
						Remedy Plan		

California	Yes. VZ has had measures and standards since August 1999. Measures were revised effective May 2001 to incorporate parties' negotiated changes to the metrics	Proceeding number: R.97-10- 016/I.97-10-017, decision D.99- 08-020, and D.01-05-087.	The measurements resulted from collaborative negotiations between Pacific, Verizon and the CLECs as part of the PUC's investigation into the OSS performance of Pacific and Verizon. The Commission has adopted a Change Mgmt Process (completed in Feb. 1999), and performance measures. The implementation of a performance incentive plan is pending.	The metrics were developed specifically for California and Nevada	The CPUC provides for periodic reviews of the measures. Review is initiated by the CPUC via a pre-hearing conference. Parties propose changes, negotiate and agree to settle, whenever possible. Parties submit their agreements and open issues to the CPUC for it to approve and where there are issues, to decide.	Almost. Final decision adopting payment amounts for a performance incentive plan will be adopted in February 2002. This, plus the decision adopting the incentives model (D. 01-01-037) in January 2001 will comprise California's incentive plan.	Yes, the measures were audited by Deloitte & Touche.	Generally ok although real test of the measures and standards will occur once commercial volumes exist. No incentive payments have been made yet. It is possible that the parties have overlooked a process that turns out to be critical to the OSS process, or that the ILEC's interpretation of business rules allows it to under-report performance failure
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ILEC/	Has State	Docket/	How Metrics and	Whether Metrics	Does State Hold	Whether	Whether a 3 rd	What General
State	Ordered Metrics and Standards	Order Number	Standards Were Adopted	and Standards Are Regional or State Specific	Periodic Reviews of the Metrics and Standards	Metrics and Standards Have an Associated Remedy Plan	Party Tested or Audited the Metrics	Improvements To the Plans Are Needed
Delaware Delaware	Verizon currently required to comply with performance metrics embodied in the PAP, which largely mirrors the New York performance assurance plan.	State proceeding is Docket No. 99-07-27 (DPUC Promulgation of Performancebased Reporting Requirements Regulations for Connecticut Telephone Companies [ILEC]) provides for an industry working group to negotiate and recommend to the DPUC specific performance standard measures and submeasures, penalties, business rules and terms and conditions relating to the implementation of performance standard measures for the wholesale provision of telecom services by the incumbent. N/A	Metrics will be proposed by an industry-working group and ultimately approved by the DPUC. The regulations and reporting requirements from DPUC Docket No. 99-07-27 are not yet final or effective.	N/A	Verizon files changes to its PAP with DPUC.	The regulations, and ultimately metrics, anticipated from the DPUC Docket No. 99-07-27 are separate and distinct from the PAP adopted as a result of the state 271 proceeding.	N/A	Has room for improvement. The regulations and reporting requirements from DPUC Docket No. 99-07-27 are not yet final or effective.
Delamare	110	IN/A	18/A	17//AL	IVA	140.	17/74	17/71

ILEC/ State	Has State Ordered Metrics and Standards	Docket/ Order Number	How Metrics and Standards Were Adopted	Whether Metrics and Standards Are Regional or State Specific	Does State Hold Periodic Reviews of the Metrics and Standards	Whether Metrics and Standards Have an Associated Remedy Plan	Whether a 3 rd Party Tested or Audited the Metrics	What General Improvements To the Plans Are Needed	
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Maine	No. PAP and	Docket No.	The PAP and C2C	Likely to be both, but	TBD	TBD.	No.	TBD
	C2C are currently	2000-849.	metrics are both based	largely regional,		<u> </u>		
	being considered		on NY. The PUC has	based on NY.			1	
	in the state 271	İ	stated an intent to add					
	proceeding.	1	ME specific metrics.			1		
Maryland	No. The	No official	The metrics and	Regional, based on	Plan is not in place	There is no	No. There has been	TBD
	Commission is	docket number.	standards are modeled	NY.	yet so it is not	process yet for	no 3 rd party test or	
	now considering		after NY, although		known how periodic	implementation	audit of the metrics.	
	metrics and		there are some state		reviews will be	of remedies.		
	standards in the	ļ	specific metrics.	ļ	handled.	ļ		ļ
	oп-going		Differences are usually					
	"Collaborative"	•	related to timing (one					
	process. A	ļ	state implementing			ļ	Į.	<u> </u>
	decision]	new/changed metrics					
	could come at	İ	before another state).					"
	any time.	}	Verizon has generally	}		}		<u> </u>
			agreed with CLECs					
		İ	and the state				1	
		}	commission about the			ļ	\	<u> </u>
			need for metrics and			İ		İ
			standards. Thus,					
		}	consensus has			ļ		
		}	generally been					
	<u> </u>		achieved.	1				

STATE METRICS MATRIX PREPARED BY WORLDCOM Whether Metrics

and Standards

Are Regional or

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of the Metrics

Periodic Reviews

Whether

Metrics and

Standards

How Metrics and

Standards Were

Adopted

ILEC/

State

Has State

Ordered

Metrics and

Docket/

Number

Order

	Standards	Namber	Auopicu	State Specific	and Standards	Have an Associated Remedy Plan	Metrics	Are Needed
Mass.	Yes, metrics are in place. On January 14, 2000, the DTE adopted the New York Carrier-to-Carrier Performance Guidelines (as amended on a going-forward basis) as the "set of metrics used by the DTE for purposes of the Master Test Plan and for evaluating Verizon's compliance with the requirements contained in Section 271."	D.T.E. 99-271, January 14, 2000 DTE Letter Order on Final OSS Master Test Plan, Attach. A (http://www.stat e.ma.us/dpu/tele com/99- 271/OSS/LtrOrd er Jan14.pdf).	Metrics based on NY C2C (as amended), per DTE order.	Regional, based on NY metrics.	Per the DTE's January 14, 2000 Letter Order, the Guidelines adopted "will continue to be modified by all future additions, deletions or modifications made to the C3C Guidelines hereafter by the NYPSC."	Penalties are based on the same standards as the MA PAP, and the NY plan. They are also subject to NY revisions.	Yes. The DTE "direct[ed] KPMG to examine and evaluate Bell Atlantic's performance based on the metrics contained in the C2C Guidelines that are in effect when the preorder, order and provisioning transaction testing begins."	Some of the metrics need improvement.
New Hampshire	No. On June 7, 2001, Verizon petitioned the PUC to approve the NY C2C metrics for NH. The PUC is reviewing and has not made a decision on whether it will accept the NY measures or modify them.	Docket No. 01-006	Will be primarily based on the NY metrics, though they may be tailored to address the specific concerns of competitors in NH.	Regional, based on NY.	If the VZ proposed metrics are adopted in NH, any revisions to the NY metrics will be filed in NH within 20 days.	No. Options are still being reviewed and a PAP has not yet been finalized.	Yes. As part of its OSS review for sameness, PWC did a review of the NH metric reporting for sameness with the New England region.	Some of the metrics need improvement.

Whether a 3rd

Audited the

Party Tested or

What General

Improvements

To the Plans

ILEC/	Has State	Docket/	How Metrics and	Whether Metrics	Does State Hold	Whether	Whether a 3 rd	What General
State	Ordered	Order	Standards Were	and Standards	Periodic Reviews	Metrics and	Party Tested or	Improvements
	Metrics and	Number	Adopted	Are Regional or	of the Metrics	Standards	Audited the	To the Plans
	Standards			State Specific	and Standards	Have an	Metrics	Are Needed
		Ì	•			Associated		
<u> </u>						Remedy Plan		

New	Yes. The Board	Docket No.	The metrics and	Regional, based on	Plan has not been in	Yes. The Board	Yes. The metrics	Some of the
Jersey	has ordered	TX98010010	standards are modeled	NY.	place long enough	ordered	were included in the	metrics need
	metrics.		after NY, although	1	to know how	remedies in	3 rd party test.	improvement.
			there are some state		periodic reviews	October 2001 in	' -	The penalty
			specific metrics.		will be handled.	the same docket		amounts are very
			Differences are usually			as the metrics		low.
			related to timing (one			docket.		
		1	state implementing					
			new or changed			The remedies,		
			metrics before another			which are tied to		
			state).			the metrics, are]
			Verizon has generally			based on the		
			agreed with the			staff plan, which		
			CLECs and the state			is not based on		
			commission about the			NY. plan. It is a		İ
			need for metrics and			per occurrence/		
			standards. Thus, with			per measure		
			minor exceptions			plan.		
			consensus has	[
	1		generally been]				ì
			achieved.		<u> </u>			

ILEC/ State	Has State Ordered Metrics and Standards	Docket/ Order Number	How Metrics and Standards Were Adopted	ATRIX PREPAR Whether Metrics and Standards Are Regional or State Specific	Does State Hold Periodic Reviews of the Metrics and Standards	Whether Metrics and Standards Have an Associated Remedy Plan	Whether a 3 rd Party Tested or Audited the Metrics	What General Improvements To the Plans Are Needed
New York	Yes. Metrics have been in place since February 16, 1999.	Adopted in Case 97-C-0139, Proceeding on Motion of the Commission to Review Service Quality Standards of Telephone Companies, Order Adopting Inter-Carrier Service Quality Guidelines (issued and effective February 16, 1999).	At the time it instituted Case 97-C-0139 in Feb. 1997, the PSC recognized that no formal service quality standards for carrier-to-carrier services existed, although the issue had been raised by parties in several other PSC proceedings, and directed Staff to work with parties to address the issues concerning C2C standards. Interim Guidelines for C2C Standards and Reports were developed through a collaborative process involving industry reps, Staff and the ALJ overseeing the proceeding. The Commission approved the Interim Guidelines on 3/16/98, for a trial period extending through 12/31/98. Then, on 2/16/99, the Commission issued an order adopting the C2C Guidelines, a revision of the Interim Guidelines document.	Regional in that other states have based their metrics on NY.	The C2C Guidelines are subject to change, as Case 97-C-0139 remains an ongoing proceeding with CWG meeting regularly throughout the year to discuss modifications that should be made to the Guidelines as parties gain experience in the market. Consensus and non-consensus modification proposals are acted on by the Commission on Generally a biannual basis.	Yes. Penalties are tied to VZ's PAP, not to the C2C Guidelines.	Yes. KPMG tested the metrics as part of the OSS review for Verizon's 271 application. More specifically, KPMG tested the accuracy of VZ's reporting, not the adequacy of the metrics. Since KPMG's test, there have been many modifications to the C2C Guidelines. Staff has been replicating the metrics.	Some of the metrics need improvement. For example, the trunking measures are inadequate. The measures, including the trunk blocking metric, are currently the subject of review and negotiations within the CWG.

ILEC/ State	Has State Ordered Metrics and Standards	Docket/ Order Number	How Metrics and Standards Were Adopted	Whether Metrics and Standards Are Regional or State Specific	Does State Hold Periodic Reviews of the Metrics and Standards	Whether Metrics and Standards Have an Associated Remedy Plan	Whether a 3 rd Party Tested or Audited the Metrics	What General Improvements To the Plans Are Needed
Penn.	Yes. First order was December 1999. The PUC is now considering a recommended decision of an ALJ in its review of the PAP. A decision could come at any time.	Docket No. P-00991643, and Docket No. M-00011468.	The metrics and standards are modeled after NY, although there are some state specific metrics. Differences are usually related to timing (one state implementing new or changed metrics before another state). Verizon has generally agreed with the CLECs and the state commission about the need for metrics and standards. Thus, with some minor exceptions consensus has generally been achieved.	Regional, based on NY.	There is a presumption that changes in NY are appropriate for PA, but that presumption is rebuttable.	The commission initially ordered a plan, but it was shown to be weak during the 271 case. As a result, the PUC instituted the latest proceeding. The ALJ has recommended that the PUC adopt essentially the NY plan. The remedies are tied to the metrics.	Yes. The metrics were included in the 3 rd party test.	Poor.

ILEC/ State	Has State Ordered Metrics and Standards	Docket/ Order Number	How Metrics and Standards Were Adopted	Whether Metrics and Standards Are Regional or State Specific	Does State Hold Periodic Reviews of the Metrics and Standards	Whether Metrics and Standards Have an Associated Remedy Plan	Whether a 3 rd Party Tested or Audited the Metrics	What General Improvements To the Plans Are Needed
Rhode	Yes. Per recent Order, C2C metrics have been adopted.	Docket Nos. 3195 & 3256, Report and Order (Dec. 3, 2001. In re: VZ-Rhode Island's Proposed Carrier-to- Carrier Performance Standards and Reports and Performance Assurance Plan for Rhode Island. (http://www.ripu c.org/order/pdfs/ VRI CTC PAP Ord16809.pdf)	Based on NY & MA, per PUC order.	Regional in that they are based on NY & MA. PUC also incorporated two PA billing metrics into C2C and PAP, made several changes to how PAP penalties would be calculated, and ordered potential future revisions to C2C to be based on changes in all VZ states, not just NY and MA.	From Dec. 3, 2001 Report & Order: "the Commission requires Verizon to file for Commission consideration of any new metrics adopted in Verizon's service territory, as well as in the former Bell Atlantic territory before its merger with GTE, within thirty (30) days of the compliance filing with that state Commission. In addition, to assist the Commission in determining whether Verizon is meeting the PAP metrics, the Commission will require Verizon to file with its monthly C2C performance reports a chart, similar to one submitted in Docket No. 3363, indicating whether it has met or failed to meet each PAP metric included in C2C."	Penalties are tied to metrics comprising the PAP; also subject to NY & MA revisions, i.e., "Any modifications ordered to the PAPs in NY or MA will be filed for this Commission's review within 10 days of the compliance filing in NY or MA").	Yes. Per May 17, 2001 Order, the PUC "direct[ed] KPMG to submit an amended final Master Test Plan for the Verizon-Rhode Island OSS Test that excludes metrics report validation and data integrity validation." KPMG generally conducted "sameness" testing "to determine whether the processes and procedures" were the same for VZ-RI and VZ-MA.	Some of the metrics need improvement. Also, the PUC's demand to be informed of metrics changes throughout VZ's territory suggests that RI metrics may evolve.

ILEC/	Has State	Docket/	How Metrics and	Whether Metrics	Does State Hold	Whether	Whether a 3 rd	What General
State	Ordered	Order	Standards Were	and Standards	Periodic Reviews	Metrics and	Party Tested or	Improvements
}	Metrics and	Number	Adopted	Are Regional or	of the Metrics	Standards	Audited the	To the Plans
	Standards			State Specific	and Standards	Have an	Metrics	Are Needed
		ļ				Associated		ļ
			<u> </u>	<u></u>		Remedy Plan		

Virginia	Yes. The SCC	Docket No.	The metrics and	Regional, based on	Verizon is required	Not yet. The	Yes. The metrics	TBD. Order was
Ü	issued an order	PUC -010206	standards are modeled	NY.	to file with the	SCC is	were included in the	just released.
	on 1/4/02	and Docket No.	after NY, although		Commission the NY	considering	3 rd party test.	,
	requiring VZ to	010226.	there are some state		consensus and/or	remedies in		
	implement the		specific metrics.	Ì	non-consensus	Docket 010226.		i
	agreed to and		Differences are usually		metric change(s)			
	ordered metrics		related to timing (one		and proposed]
	and standards by	1	state implementing		implementation			
	1/18/02.First		new or changed		schedule, including			
	results to be		metrics before another		an explanation of			
	reported in		state).		time required to			
	March based on				implement, and	1		•
	February 2002		Verizon has generally		description of the			
	data Remedies		agreed with the		changes made to	ļ	4	
	are the subject of		CLECs and the state		adapt to Virginia			
	a second docket.		commission about the		systems. Filings			
	Comments in the		need for metrics and		must be made	1		
	remedies docket		standards. Thus, with		within 30 calendar			
	were filed in	}	some minor exceptions	!	days of submission			
	November, 2001.	1	consensus has		date of the	•		İ
	Date for a		generally been		compliance filing in			
	decision in the remedies docket	ļ	achieved.		NY.			
	is unknown.	Ì						
Vermont	Yes. Per	Dealers No. 6355	Metrics are based on	Dagional based on	If a change is made	Not yet	Yes. As part of its	Some room for
v er mont	Stipulation	Docket No. 6255	the NY metrics.	Regional, based on NY.	to NY it must be	Not yet. Penalties are	OSS review for	improvement.
	setting NY C2C			IN I.	filed in VT within	still being	sameness, PWC did	improvement.
	measurements as		though they may be tailored to address the		30 days.	discussed in VT	a review of the VT	Ì
	the		specific concerns of		30 days.	Docket No.	metric reporting for	
	measurements	}	competitors in VT.		1	6255. No final	sameness with the	1
	for VT (October		competitors in V1.		1	PAP has been	New England	
	2001).					issued.	region.	
Wash. DC	No	N/A	N/A	N/A	N/A	No	N/A	N/A
West	No	N/A	N/A	N/A	N/A	No	N/A	N/A
Virginia	<u></u>	<u> </u>	<u> </u>					

APPENDIX B



ILEC PERFORMANCE MEASUREMENTS & STANDARDS For LOCAL INTERCONNECTION, RESALE AND UNEs

Version 2.0

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PREORDERING/GENERAL OSS METRICS:

1. Percent System Availability

Metric Number: Name:

Definition:

This measurement shows the whether OSS interfaces on the ILEC's side of the gateway are operating in a non-degraded capacity.

Exclusions:

Scheduled Downtime if Appropriately Noticed Through Change Control Process.

Business Rules:

The interface is considered down if any part of the route to the ILEC back end system from the ILEC gateway is down. Degraded operations (errors or timeouts for every sixth transaction) also are included in the calculation. No down time is to be scheduled during CLEC prime hours of operation as well ILEC prime hours, meaning no scheduled down time between 6 a.m. to 12 p.m. (EST, CST, MST, PST) should be scheduled to capture prime times across the country for CLEC order entry centers. The denominator is not to exceed the total hours in the reporting period. If the ILEC desires to multiply the denominator by the number of servers in an automatic load balancing situation, it must weight the outage in the numerator by the number of servers the CLEC has supporting its operations. For example, if one CLEC's interface is supported by five servers and another CLEC's by one server, the latter CLEC would have its outage hour multiplied by five to designate its impact. Partial weights need also be agreed to for degraded service.

Levels Of Disaggregation:

Each Individual Interface Type Offered (e.g. Web GUI, EDI, ECTA etc.).

Calculation:	Report Structure/Geography:	
(Number of Scheduled Interface Available	CLEC Specific	
Hours -Number of Unscheduled Interface	CLEC Aggregate	
Unavailable Hours / Total Hours of	ILEC	
Scheduled Availability) x 100	ILEC Affiliate(s)	
• ,	Geographic: State	

Benchmark/Parity Performance Standard:

99.5% Availability

Impact on Carriers' Regulatory Burden:

Dominant carriers on which CLECs depend must bear the burden of assuring the performance provided to their CLEC customers is (1) at parity with retail service or (2) at a benchmark level that provides the CLEC with a meaningful opportunity to compete. CLECs do not have the leverage to negotiate satisfactory service level agreements and enforcement clauses from their major (if not sole-source) supplier and competitor and meaningful competition requires the ordering of such reporting and remedies. System availability can be monitored automatically and this information should not be a burden for ILECs to provide. Most large ILECs already provide this information in state wholesale performance reporting.

Metric Number: Name:

2 (a) Query Response Timeliness

(b) Percent Ordering/PreOrdering System Error/TimeOuts

Definition:

This measurement shows the percent of queries the ILEC returns to the CLEC within the benchmark interval for those queries submitted through the ILEC's interfaces.

Exclusions:

Test Transactions

Business Rules:

The query transaction is measured from the time the CLEC query reaches the ILEC gateway to the time the query response is returned to the ILEC gateway. Error or reject message returns are measured separately so that their often swift return does not dilute the times for responses actually containing information. A separate measurement of percent of time-outs and non-CLEC-caused system error messages also are measured to determine whether there are problems with the systems not captured by query response time measurement alone. Timeouts are measured to the longest time it would take to return an informational response to a specific type of query. As new interfaces and query types are implemented in production, the ILEC must measure them within six weeks of implementation. If special benchmark is needed for new query type, then reporting will be diagnostic until next periodic review of the measurements.

For some ILECs, Loop Make Up Information and Large CSRs can only be obtained through manual query processes. Manual processes will be measured as separate disaggregations with different benchmarks.

Levels Of Disaggregation:

By the Type of Query Below As Provided by Each Interface (e.g. EDI, GUI, CORBA, ECTA and maintenance GUI).

Pre-Order Oueries:

Electronic CSR

Parsed CSR

Manual CSR

Due Date Scheduling

Number Reservation

Address Validation

Service/Product Availability

Electronic Loop Make Up Information

Manual Loop Make Up Information

Manual Dark Fiber Facilities Check

Manual DS1, DS3 and OCn Facilities Check

CFA

PIC

(Any other query type provided by ILEC.)

Maintenance:

Open Trouble Close Trouble

Status Trouble

Mechanized Line Testing

(Any other query type provided by ILEC)

All PreOrder/Ordering Error/Reject Messages

Percent Time Outs/System Error Messages

Calculation:	Report Structure/Geography:
(Number of PreOrder and Maintenance	CLEC Specific
Query Responses Provided Within	CLEC Aggregate
Benchmark Standard / Total Number of	ILEC
Queries in Reporting Period.) x 100	ILEC Affiliate(s)
_	Geographic: State
Number of PreOrder and Ordering Queries	
That Time Out / Number of PreOrder and	
Ordering Queries Submitted in reporting	
period	
-	

Benchmark/Parity Performance Standard:

Parsed CSR: 95% Parity + 10 seconds

Manual CSR 95% in 2 days.

Manual Loop Qualification 95% in 24 hours Manual Dark Fiber Facilities Check in 48 hours DS1, DS3, OCn Facilities Check in 24 hours

All Other Queries: 95% in Parity + 2 seconds (Benchmarks are also appropriate but times vary among ILEC regions.)

Impact on Carriers' Regulatory Burden:

Dominant carriers on which CLECs depend must bear the burden of assuring the performance provided to their CLEC customers is (1) at parity with retail service or (2) at a benchmark level that provides the CLEC with a meaningful opportunity to compete. CLECs do not have the leverage to negotiate satisfactory service level agreements and enforcement clauses from their major (if not sole-source) supplier and competitor and meaningful competition requires the ordering of such reporting and remedies. This information can be captured by most ILECs for the wholesale interfaces they deploy. Performance of legacy retail OSS systems that cannot provide this information automatically can be assessed through electronic emulation and sampling. Benchmarks may also be used, but retail reporting still needs to be monitored to adjust the benchmark accordingly.

CHANGE CONTROL METRICS:

Me	tric	Nu	mber:	Non	10.
ITEL	L1 IL	1 7 24		1341	15.

3 (a) Percent Change Management Notices/Documentation Sent On-Time

(b) Average Delay Days

Definition:

This measurement shows the percentage of time in which the CLEC received notices of business rule and software changes and any associated documentation within intervals established in the Change Control Process rules developed collaboratively by ILEC and CLEC trading partners.

Exclusions:

None

Business Rules:

Measurement of the interval for determining timely sent notices and documentation start the date the notice/documentation is sent and end on the effective/production date for the change. When no notice of or documentation for the change is received at all, the notice/documentation is counted as late. The timeliness of notice/documentation will be measured in the month in which the change is implemented, meaning that the times used in the numerator may reach back to prior reporting periods. Average Delay Days are counted from when the notice/documentation should have been sent to the date the notice/documentation actually was sent.

Levels Of Disaggregation:

Notices

Documentation

Report Structure/Geography:
CLEC Specific
CLEC Aggregate
ILEC Affiliate(s)
Geographic: State

Benchmark/Parity Performance Standard:

98% within interval for Notices, Draft and Final Documentation in Change Control Process Guidelines.

Average Delay Days = < 5 days.

Impact on Carriers' Regulatory Burden:

Dominant carriers on which CLECs depend must bear the burden of assuring the performance provided to their CLEC customers is (1) at parity with retail service or (2) at a benchmark level that provides the CLEC with a meaningful opportunity to compete. CLECs do not have the leverage to negotiate satisfactory service level agreements and enforcement clauses from their major (if not sole-source) supplier and competitor and meaningful competition requires the ordering of such reporting and remedies. This metric is crucial to CLECs in keeping OSS interfaces irreversibly open, and any burden on ILEC would not outweigh this benefit. The number of changes monthly should not be time intensive to keep either manually or in a database.

Metric Number: Name:

- 4 (a) Percent Software Error Correction in X Days
 - (b) Average Delay Hours/Days

Definition:

This measurement calculates the percentage of software errors corrected within the benchmark intervals for problems with and without work arounds.

Exclusions:

- ILECs may exclude problems that ILEC and CLEC agree are the CLEC's fault. (If fault is disputed,
 - ILEC must list the number of such disputed problems in the reporting period.)
- Problems resulting during software certification processes prior to production.

Business Rules:

Software problems are tracked from when the CLEC reports the problem to the help desk to when the CLEC concurs that the problem has been resolved upon receiving a resolution call from the ILEC help desk. Software problems are those that cause failed transactions. A transaction is considered failed if it results in incorrect or improperly formatted data. The ability to fax preorder/order requests does not mean the problem has a work around.

Levels Of Disaggregation:

Problems Without Work-Arounds Problems With Work-Arounds.

Report Structure/Geography:
CLEC Specific
CLEC Aggregate
ILEC Affiliate(s)
Geographic: State

Benchmark/Parity Performance Standard:

Problems without Work Arounds: 98% Cleared in 24 hours

Problems with Work Arounds: 98% in 72 hours

Impact on Carriers' Regulatory Burden:

Dominant carriers on which CLECs depend must bear the burden of assuring the performance provided to their CLEC customers is (1) at parity with retail service or (2) at a benchmark level that provides the CLEC with a meaningful opportunity to compete. CLECs do not have the leverage to negotiate satisfactory service level agreements and